

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ALEJANDRO HUGGINS, on behalf of :  
himself and others similarly situated :  
: :  
*Plaintiff, and Lead* :  
*Plaintiff for the Proposed* : Civil Action No. 18-001037-PAC  
*Class,* :  
v : **NOTICE OF MOTION TO OVERRULE**  
CHESTNUT HOLDINGS INC.; 1425 U : **OBJECTIONS TO AND TO COMPEL**  
LLC; and JONATHAN WIENER : **RESPONSES TO REQUESTS FOR**  
: **PRODUCTION AND**  
*Defendants* : **INTERROGATORIES**  
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**To:** Daniel C. Moreland  
Neresa De Biasi  
Clifton Budd & DeMaria, LLP  
*Attorneys for Defendants*  
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New York, New York 10118

**PLEASE TAKE NOTICE** that upon the attached Declaration of Scott Simpson, dated November 28, 2018, and the exhibits annexed thereto, the accompanying Memorandum of Law in Support of Plaintiff's Motion to Overrule Objections to and to Compel Responses to Requests for Production and Interrogatories, and upon all prior pleadings and proceedings herein, Plaintiff Alejandro Huggins, through his attorneys, Beranbaum Menken LLP, will move this Court before the Honorable Paul A. Crotty, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York, Courtroom 14C, for an Order pursuant to Fed. R. Civ. P. 37 overruling Defendants' objections to Plaintiff's Requests to Produce 11, 13, 16-19, 21-26, and 30,

and Defendant's objections to Plaintiff's Interrogatories 1, 6, 8, and 9, and compelling Defendants to provide responsive documents to Plaintiff's Requests to Produce 11, 13, 16-19, 21-26, and 30, and Interrogatories 1, 6, 8, and 9 by a date certain, and for any other such relief as the Court finds just and proper.

Dated: New York, New York  
November 28, 2018

/s/ Brenna Rabinowitz  
Brenna Rabinowitz  
Scott Simpson  
Beranbaum Menken LLP  
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